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7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 * * *

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 vs.
14 TRAVIUNTA WOODS,
15 Defendant.

2:12-cr-187-KJD-PAL-1

STIPULATION TO EXTEND
DEADLINES IN THIS COURT'S
JUNE 1, 2015 ORDER BY
SIXTY (60) DAYS

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17 The United States of America, by Assistant United States Attorney Elizabeth Olson White,
18 and Defendant Traviunta Woods, by Assistant Federal Public Defender Nisha Brooks-Whittington,
19 submit the following Joint Stipulation to extend, by sixty (60) days, all of the deadlines set in this
20 Court's Order dated June 1, 2015. *See* CR 80.

21 The parties agree and stipulate to the following:

22 1. On March 11, 2014, this Court sentenced Defendant to 100 months' imprisonment
23 on his conviction for drug-related offenses. CR 74.

24 2. On January 15, 2015, Defendant filed a *pro se* motion for a reduction of sentence
25 pursuant to 18 U.S.C. § 3582(c)(2) in light of Guidelines Amendment 782. CR 76.

26 3. On January 27, 2015, this Court issued an Order appointing the Federal Public
27 Defender to represent Defendant, and setting deadlines. Specifically, the Court ordered the
28 Probation Office to provide certain documents to the parties within 30 days (i.e., by

February 26, 2015) and ordered the Federal Public Defender to file any appropriate motion or stipulation within 120 days (i.e., by May 27, 2015). CR 78.

4. On May 27, 2015, the parties filed a joint stipulation to extend the deadlines in this Court's January 27, 2015 Order by 90 days. CR 79. On June 1, 2015, the Court granted the stipulation. CR 80.

5. The parties have reached a proposed resolution of this case. Undersigned counsel needs additional time to send documentation regarding the proposed resolution to client and to discuss the documentation with client.

6. For the reason stated above, the parties respectfully request that the Court issue an order extending the deadlines in the Court's June 1, 2015 Order, by sixty (60) days.

DATED this 20th day of August, 2015.

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

/s/ Nisha Brooks-Whittington

NISHA BROOKS-WHITTINGTON,
Assistant Federal Public Defender


DANIEL G. BOGDEN
United States Attorney

/s/ Elizabeth O. White

ELIZABETH O. WHITE,
Appellate Chief and
Assistant United States Attorney

IT IS SO ORDERED.

Dated: 8/27/2015


U.S. District Judge